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*Attorneys for Toyota Tsusho America, Inc.  
and its affiliates*

UNITED STATES BANKRUPTCY COURT  
SOUTHERN DISTRICT OF NEW YORK

In re

DELPHI CORPORATION, et al.,

Debtors.

Chapter 11

Case No.: 05-44481 (RDD)

(Jointly Administered)

**NOTICE OF APPEARANCE AND REQUEST FOR SERVICE OF PAPERS**

**PLEASE TAKE NOTICE** that, the law firm set forth below appear as counsel for **Toyota Tsusho America, Inc. and its affiliates** (collectively, “Toyota”), creditors and parties-in-interest in the above-captioned Chapter 11 bankruptcy case, and pursuant to Rules 2002, 9007 and 9010 of the Federal Rules of Bankruptcy Procedure (the “Bankruptcy Rules”) and Section 1109(b) of Title 11 of the United States Code, as amended (the “Bankruptcy Code”), request that the following names and addresses be added to the mailing list maintained by the Clerk of Court and Debtors’ counsel in this case and further demands that all notices given or required to be given in this case and

all papers served or required to be served in this case by all counsel, parties-in-interest,  
and this Court be given to and served upon the following counsel:

Attn: Stuart A. Krause, Esq.  
Peter Janovsky, Esq.  
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**PLEASE TAKE FURTHER NOTICE** that, the foregoing demand includes not only the notices and papers referred to in the Bankruptcy Rules and Bankruptcy Code set forth above, but also includes, without limitation, orders and notices of, any application, motion, petition, pleading, request, complaint or demand, whether formal or informal, whether written or oral, and whether transmitted, conveyed by mail, hand delivery, telephone, telegraph, telex, e-mail or otherwise, which affects the Debtors or property of the Debtors or the rights of creditors and parties-in-interest such as Toyota.

**PLEASE TAKE FURTHER NOTICE** that, Toyota does not intend that this Notice of Appearance and Request for Service of Papers or any later appearance or pleading be deemed or construed to be a waiver of its right: (i) to have final orders in non-core matters entered only after de novo review by a District Judge; (ii) to trial by jury in any proceeding so triable in this case or any case, controversy, or proceeding related to this case; (iii) to have the District Court withdraw the reference in any matter subject to mandatory or discretionary withdrawal; and (iv) to any other

rights, claims actions, setoffs, or recoupments to which it is or may be entitled, in law or in equity, all of which rights, claims, actions, defenses, setoffs and recoupments Toyota expressly reserves.

Dated: New York, New York  
October 20, 2005

ZEICHNER ELLMAN & KRAUSE LLP  
*Attorneys for Toyota Tsusho America, Inc.  
and its related companies*

By: /s/ Stuart A. Krause  
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